



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



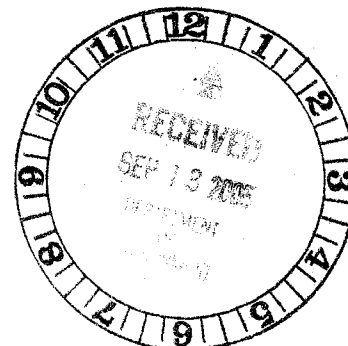
JENNIFER M. GRANHOLM  
GOVERNOR

STEVEN E. CHESTER  
DIRECTOR

September 6, 2005

CERTIFIED MAIL

Mr. Matthew Wilkinson, President  
Gibraltar Land Company  
1491 West Jefferson Avenue  
Trenton, Michigan 48183



Dear Mr. Wilkinson:

SUBJECT: Application for Solid Waste Disposal Area Operating License; Gibraltar Land Company; Countywide Landfill; Waste Data System Number 424881; License Number 9113

The staff of the Department of Environmental Quality (DEQ) has reviewed your application for a Type III low hazard industrial landfill, known as Countywide Landfill, located in the city of Gibraltar, Wayne County, Michigan. This review was conducted under the provisions of Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Based upon our review of your application, your operating license is hereby granted. Enclosed is your license with operating stipulations.

If you have any questions, please contact Dr. Benedict Okwumabua, Southeast Michigan District Supervisor, Waste and Hazardous Materials Division, at 586-753-3830.

Sincerely,

Steven R. Sliver, Chief  
Storage Tanks and Solid Waste Section  
Waste and Hazardous Materials Division  
517-373-1976

Enclosure

cc: Wayne County Department of Environment  
City of Gibraltar Clerk  
Dr. Benedict Okwumabua, DEQ – Southeast Michigan  
Ms. Carolyn Parker, DEQ – Southeast Michigan  
Facility File



Michigan Department of Environmental Quality  
Waste and Hazardous Materials Division

## SOLID WASTE DISPOSAL AREA OPERATING LICENSE

This license is issued under the provisions of Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.11501 et seq., and authorizes the operation of this solid waste disposal area (Facility) in the state of Michigan. This license does not obviate the need to obtain other authorizations as may be required by state law.

FACILITY NAME: Countywide Landfill

LICENSEE/OPERATOR: Gibraltar Land Company

FACILITY OWNER: Gibraltar Land Company

PROPERTY OWNER: Gibraltar Land Company

FACILITY TYPE(S): Type III Low Hazard Industrial Landfill

FACILITY ID NUMBER: 424881

COUNTY: Wayne

LICENSE NUMBER: 9113

ISSUE DATE: September 6, 2005

EXPIRATION DATE: September 6, 2010

FACILITY DESCRIPTION: The Countywide Landfill, a Type III Low Hazard Industrial Landfill, consists of 167.9 acres located at 15701 Vreeland Road, city of Gibraltar, Wayne County, Michigan, as identified in Attachment A and fully described in this license.

AREA AUTHORIZED FOR DISPOSAL OF SOLID WASTE: As identified in Attachment A.

RESPONSIBLE PARTY: Mr. Matthew Wilkinson, President  
Gibraltar Land Company  
1491 West Jefferson Avenue  
Trenton Michigan 48183  
734-246-4009

**RENEWAL OPERATING LICENSE:** This License Number 9113 supersedes and replaces Solid Waste Disposal Area License Number 8954 issued to Gibraltar Land Company on July 25, 2003.

This license is subject to revocation by the Director of the Michigan Department of Environmental Quality if the Director finds that this Facility is not being constructed or operated in accordance with the approved plans, the conditions of a permit or license, Part 115, or the rules promulgated under Part 115. Failure to comply with the terms and provisions of this license may result in legal action leading to civil and/or criminal penalties pursuant to Part 115. This license shall be available through the licensee during its term and remains the property of the Director.

**THIS LICENSE IS NOT TRANSFERABLE.**

Steven R. Sliver, Chief, Storage Tank and Solid Waste Section  
Waste and Hazardous Materials Division

Licensee: Gibraltar Land Company  
Facility Name: Countywide Landfill  
Operating License Number: 9113  
Issue Date: September 6, 2005

The licensee shall comply with all terms of this license and the provisions of Part 115 and its administrative rules. This license includes the license application and any attachments to this license.

1. The licensee shall operate the Facility in a manner that will prevent violations of any state or federal law.
2. The following portions of the Facility are authorized to receive solid waste by this license:

**ACTIVE PORTIONS NOT AT FINAL GRADE:** The area(s) identified as existing fill area were authorized to receive waste by the previous license. This area's total acreage is 49.5 acres.

3. The following portions of the Facility **WILL BE** authorized to receive solid waste by this license following approval by the Michigan Department of Environmental Quality (DEQ) of construction certification:

**UNCONSTRUCTED AREA(S) WITH FINANCIAL ASSURANCE:** The area(s) identified as Cells 1-5, totaling 68.7 acres, are included in the calculation of financial assurance as required by Section 11523 of Part 115. This portion(s) of the Facility shall be authorized to receive waste, as part of this license, when acceptable certification is submitted to the DEQ, as required by Section 11516(5) of Part 115, and determined by the DEQ to be consistent with Part 115 and the administrative rules. The certification shall verify that construction of this area(s) was in accordance with the documents listed in Item 8 of this license, Part 115, and the administrative rules implementing Part 115.

4. The following portions of the Facility are **NOT** authorized to receive solid waste by this license: N/A.
5. The attached map (Attachment A) shows the Facility, the area permitted for construction, monitoring points, leachate storage units, site roads, other disposal areas, and related appurtenances.
6. Issuance of this license is conditioned on the accuracy of the information submitted by the Applicant in the Application for License to Operate a Solid Waste Disposal Area (Application) received by the DEQ on June 9, 2005, and any subsequent amendments. Any material or intentional inaccuracies found in that information is grounds for the revocation or modification of this license, and may be grounds for enforcement action. The licensee shall inform the DEQ's Waste and Hazardous Materials Division, Southeast Michigan District Supervisor, of any inaccuracies in the information in the Application upon discovery.
7. This license is issued based on the DEQ's review of the Application, submitted by the Gibraltar Land Company, for the Countywide Landfill, dated June 9, 2005, and revised July 7, 2005. The Application consists of the following:
  - a. Application Form EQP 5507.
  - b. Application fee in the amount of \$2,500.00.
  - c. Certification of construction by Mr. Paul Sgriccia and Mr. John Balconi dated June 7, 2005.
  - d. Waste Characterization: N/A.
  - e. Restrictive Covenant:

The July 2, 1999 restrictive covenant on 167.87 acres is on file at the Wayne County Register of Deeds recorded on August 11, 1999, as Liber 30269 pages 1686-1689. A copy is on file with the DEQ.
  - f. Perpetual Care Fund Agreement, established as an escrow account, signed by Mr. Matthew Wilkinson, Vice President, Gibraltar Land Company on January 9, 1998, was executed by the DEQ on February 23, 1998.

g. Financial Assurance.

i. Financial Assurance Required:

The amount of financial assurance required for this Facility was calculated based on the calculation worksheet form EQP 5507A entitled, "Form A Financial Assurance Required," and is \$1,000,000.00.

The Facility has provided financial assurance totaling \$1,600,476.70, based on the requirements of Section 11523 of Part 115, consisting of a combination of the Perpetual Care Fund established under Section 11525, bonds, and the financial capability of the Applicant as evidenced by a financial test. The financial assurance mechanisms used by the Facility are summarized below in items ii and iii, respectively.

ii. Financial Assurance Provided Via a Perpetual Care Fund:

- (1) The amount of the required financial assurance can be reduced pursuant to Section 11524 of Part 115, if the amount of money in the Perpetual Care Fund plus the amount of the reduced financial assurance equals the amount of financial assurance required in Section 11523 and is approved by the DEQ.
- (2) The Perpetual Care Fund Agreement statement showed a balance of \$943,137.70 in the Facility's Perpetual Care Fund as of May 1, 2005. Of this amount, the DEQ has granted the request to use \$943,137.70 toward the total amount of financial assurance required.

iii. Financial Assurance provided via bond:

The following financial assurance has been received from the Applicant to meet the amount of financial assurance required:

|                        |              |
|------------------------|--------------|
| Surety Bond            | \$657,339.00 |
| Total Amount Received: | \$657,339.00 |

8. This facility does not have a construction permit; it was initially licensed pursuant to the repealed Garbage and Refuse Disposal Act, 1965 PA 87 with the issuance of Solid Waste Disposal Area Operating License Number 4004 on September 1, 1976. Consent Judgment 97-738609 CE entered on December 4, 1997, stipulated the submission of "Final Engineering Plans" for Area 4 (existing fill area and Cells 1-5). The following documents are incorporated in this license by reference:
- a. Engineering plans titled "McClouth Steel Corporation, Detroit, Michigan, Gibraltar Plant, Industrial Solid Waste Disposal General Area Plan prepared by Wade, Trim & Associates, Inc., dated June 26, 1975, and revised May 13, 1976.
  - b. Engineering plans titled "Industrial Solid Waste Disposal Areas, General Area Plan, Existing Fill Conditions" prepared by Wade, Trim & Associates, Inc., dated June 5, 1985.
  - c. Engineering plans (21 sheets) titled "Final Engineering Plans, Gibraltar Type III Landfill, Area 4" prepared by NTH Consultants, Ltd., signed and sealed by Mr. Ibraheem S. Alshunnar, P.E. # 39106, dated February 17, 1998, revised January 1999, and May 2001. The May 2001, version has a slightly different title and is listed in Item number 9d.
  - d. Work Plan for Hydrogeologic Investigation at Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated July 15, 1994, revised August 31, 1994.
  - e. Phase I, Hydrogeologic Investigation Report, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated March 24, 1995.
  - f. Work Plan for Soil Sampling at Leachate Outbreak Areas, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated May 2, 1995, revised December 27, 1996.

Licensee: Gibraltar Land Company  
Facility Name: Countywide Landfill  
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- g. Phase II, Hydrogeologic Investigation Report, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated July 19, 1995.
- h. Hydrogeological Monitoring Plan, McLouth Steel-Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated September 28, 1995, revised December 27, 1996, and July 28, 1998.
- i. Soil Profile Data and Clay Thickness Contours Report, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated November 21, 1996.
- j. Work Plan for Liner Investigation at Gibraltar Land Company, prepared by NTH Consultants, Ltd., dated February 27, 1997.
- k. Clay Liner Investigation Report, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated August 1, 1997.
- l. Leachate Outbreak Investigation Report: Area 4, prepared by NTH Consultants, Ltd., dated November 6, 1997.
- m. Waste Characterization and Management Data Report, Trenton/Gibraltar Landfill, prepared by Techna Corporation, dated February 19, 1998.
- n. Letter: Gibraltar Land Company, Final Engineering Plans, Leachate Outbreak Prevention Plan and Area 1A, Leachate Collection System Extension Plan, prepared by Richard A. Barr, of Dean & Fulkerson, P.C., Attorneys and Counselors, dated March 4, 1998.
- o. Report on Leachate Outbreak Prevention Plan for Area 4, prepared by NTH Consultants, Ltd., dated March 4, 1998.
- p. Temporary Leachate Outbreak Management Plan, prepared by Mr. Dennis Zurakowski, dated March 23, 1998.
- q. Memorandum: Additional Information Regarding Leachate Issues and Site Development Sequence prepared by NTH Consultants, Ltd., dated March 24, 1998.
- r. Memorandum: Landfill Operational Issues, prepared by Mr. Ibraheem S. Alshunnar, of NTH Consultants, Ltd., dated April 6, 1998.
- s. Facility Operations Plan prepared by NTH Consultants, Ltd., dated June 1998.
- t. Work Plan for Groundwater Quality Investigation and Monitoring Well Repairs, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated July 28, 1998.
- u. Memorandum: Review of Groundwater Modeling for Leachate Collection System, Gibraltar Landfill, prepared by Land and Water Management Division, DEQ, dated August 10, 1998.
- v. Work Plan for Slug Tests in Area 4, Gibraltar Landfill, prepared by NTH Consultants, Ltd., dated August 28, 1998.
- w. Groundwater Quality Evaluation Preliminary Report, Third Quarter 1998, prepared by NTH Consultants, Ltd., dated October 22, 1998.
- x. Facility Operations Plan, Area 4, prepared by NTH Consultants, Ltd., dated November 1998.
- y. Filling and Leachate Management Guidelines, Existing Fill Area – Area 4, prepared by NTH Consultants, Ltd., dated November 30, 1998.
- z. Letter regarding Leachate Management for site, prepared by Mr. Matthew Wilkinson of Gibraltar Land Company, dated December 30, 1998.
- aa. Gibraltar Landfill Area 4, Basis of Design Report, prepared by NTH Consultants, Ltd., revised January 1999.

Licensee: Gibraltar Land Company  
Facility Name: Countywide Landfill  
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9. The following additional documents, approved since the approval of the Final Engineering Plans and other documents referenced in Item 8 above are incorporated in this license by reference:
- a. Leachate Outbreaks Prevention Plan for Countywide Landfill, by NTH Consultants, Ltd., dated March 4, 1998, amended February 1, 2000.
  - b. Leachate Removal/Disposal Feasibility Study, Countywide Landfill, by NTH Consultants, Ltd., June 30, 2000.
  - c. Letter: Gibraltar Land Company Landfill – dba Countywide Landfill - Area 4, Leachate Removal/Disposal Feasibility Study, by Waste Management Division, DEQ, dated October 12, 2000.
  - d. Engineering Plans titled "Final Engineering Plans, Countywide Type III Landfill," original date February 17, 1998, revised May 2001, and received by the DEQ May 4, 2001.
  - e. Addendum to Construction Quality Assurance/Quality Control Plan, Countywide Type III Landfill, by NTH Consultants Ltd., dated May 2001.
  - f. Leachate Management Operation Plan: Temporary Collection Sump, dated May 21, 2001.
  - g. Work plan titled, "Material Removal Plan: Countywide Landfill," prepared by Gibraltar Land Company, dated September 7, 2001, revised October 4, 2001 and November 28, 2001.
  - h. Construction Documentation Report for Dike Restoration, prepared by Earth Tech, dated November 2001.
  - i. Material Removal Certification Report prepared by Environmental Specialists, Inc., dated January 6, 2002.
  - j. Design and Operation Plan for Improving the Rate of Reduction of Leachate Elevation, Active Fill Area, dated March 2002, approved with conditions stated in a letter dated July 23, 2002.
  - k. Document titled "Operation Plan for Permanent Leachate Conveyance System" prepared by CTI Associates, dated July 2003, and containing three engineering plan sheets titled "Permanent Leachate Conveyance System" dated May 29, 2003, (sheet 1) and July 24, 2003, (sheets 2, 3).
  - l. Hydrogeological Monitoring Plan, Countywide Landfill, dated February 2003, revised July 2003
  - m. Statistical Monitoring Plan, Countywide Landfill, dated July 2003.
  - n. As-built document titled "Permanent Leachate Conveyance System Construction Documentation Report" dated September 2003.
  - o. Document titled "Countywide Landfill Permanent Leachate Conveyance System Partial Construction Documentation Report" prepared by Environmental Specialists Inc., dated December 15, 2004.
  - p. Waste Screening and Acceptance Plan, prepared by Environmental Specialists inc., dated November 1999, and revised March 2003, August 2003, and March 2005.
  - q. Two engineering drawings titled "Leachate Collection and Transmission System in Existing Fill Area" revised December 11, 2003, and "Leachate Storage/Load Out Facility Details" revised November 12, 2003, and prepared by CTI Associates. These drawings were approved with modifications in a letter dated August 22, 2005.
  - r. Document titled "Operations Plan Countywide Landfill Gibraltar, Michigan" prepared by Golder Associates, dated July 18, 2005, and approved with a modification in a letter dated August 31, 2005.
9. Consent Order/Judgment Number: Consent Judgement Number 97-738609 CE by the Honorable Brian K. Zahra, Circuit Court Judge for the County of Wayne, Mr. Frank J. Kelley ex rel. Michigan Department of Environmental Quality v. McLouth Steel Products Corporation, entered on December 4, 1997, is incorporated into this license by reference.

10. The licensee shall repair any portion of the certified liner or leachate collection system which is found to be deficient or damaged during the term of this license unless determined otherwise by the DEQ.
11. The licensee shall have repairs to any portion of the certified liner or leachate collection system recertified by a registered professional engineer in accordance with R 299.4921 of Part 115 and approved by the DEQ before receiving waste in that portion of the certified liner or leachate collection system. The licensee shall submit the recertification to the DEQ's Waste and Hazardous Materials Division, Southeast Michigan District Supervisor, for review and approval.
12. The licensee shall conduct hydrogeological monitoring in accordance with the approved hydrogeological monitoring plan, dated March 2003, and revised July 2003. The sampling analytical results shall be submitted to the DEQ's Waste and Hazardous Materials Division, Southeast Michigan District Office.
13. Modifications to the approved hydrogeological monitoring plan referenced in Item 13 may be approved, in writing by the Waste and Hazardous Materials Division, Southeast Michigan District Supervisor. Proposed revisions must be submitted in a format specified by the DEQ.
14. Leachate may be recirculated if a leachate recirculation plan has been approved, in writing, by the Waste and Hazardous Materials Division, Southeast Michigan District Supervisor.
15. Modifications to approved engineering plans that constitute an upgrading, as defined in R 299.4106a(l), may be approved, in writing, by the Waste and Hazardous Materials Division, Southeast Michigan District Supervisor.
16. Requests for alternate daily cover may be approved, in writing, by the Waste and Hazardous Materials Division, Southeast Michigan District Supervisor.

17. Leakage Control Criteria:

This Type III Facility is a monitorable unit and, therefore, does not need to be in compliance with the leakage control criteria of R 299.4422.

19. **VARIANCES:** The licensee is granted the following variance(s) from Part 115 and/or its administrative rules:

The licensee shall apply cover on all exposed solid waste by the end of each working week. The licensee shall use non-clay (cohesionless) soils for the weekly coverage unless the cover soils are removed prior to another lift of waste placed in that working phase of the landfill.

20. **SPECIAL CONDITIONS:**

a. The facility may accept the following wastes:

- i. Construction and demolition wastes,
- ii. DSC central wastewater filter cake,
- iii. DSC blast furnace water plant filter cake,
- iv. Debris pile waste from the DSC Trenton facility,
- v. Wastes meeting the low-hazard criteria of R 299.4122 (1) and (2), and
- vi. Other wastes as approved in writing by the DEQ pursuant to R 299.4122 (3).

b. The licensee shall continue to monitor the groundwater at Area 4 for the additional parameters specified in the approved work plan referenced in Condition 8t of this license. The parameters shall be monitored quarterly. The licensee shall conduct an assessment of the groundwater quality twice a year at the landfill in accordance with the specifications of the aforementioned work plan. The licensee shall also develop trend analysis for chloride concentrations at each of the licensee's monitoring wells and include the data in the semi-annual reports. The licensee shall submit to the DEQ the results of the assessment for the period January through June by August 1 and for the period July through December by February 1 of the next year.

Licensee: Gibraltar Land Company  
Facility Name: Countywide Landfill  
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- c. An amendment to the leachate outbreak prevention plan of the licensee was approved to allow the continuance of the pumping and hauling of leachate in the letter dated October 12, 2000, referenced in Condition 9c of this license, in lieu of constructing the leachate pre-treatment plant/sewer discharge.

The licensee shall maintain leachate collection and storage systems at the landfill so as to provide for the daily removal of all leachate that is collected in the temporary or permanent leachate collection systems shown on the approved plans. Documentation of the amount of liquid removed from the site each week shall be provided to the DEQ with the quarterly monitoring information.

The licensee shall document compliance with this condition in its Operating Record. The leachate must be disposed of in accordance with Part 115. To demonstrate compliance with this condition, the licensee shall implement the Leachate Management Operation Plan (LMOP) and maintain the records described in the LMOP described in Item 9f of this license.

The licensee shall continue to measure the leachate elevations within the existing fill area of the landfill monthly and submit information to the DEQ with the quarterly monitoring reports using the piezometers or other approved devices by the DEQ. The quarterly report shall also include a cumulative graph of leachate elevation vs. time for each piezometer or other approved devices in the existing fill area.

The licensee shall continue to estimate leachate volumes and monitor leachate elevations in the landfill and submit the data collected through April 30 of each year. Data collected by April 30 of each year shall be submitted by May 31 annually and that data shall provide all the information as specified in the October 12, 2000, letter referred to in Item 9c of this license including direct comparison to Table 3 of that letter.

The licensee shall determine leachate elevations using the network of piezometers in place (Piezometers 1R, 2R, 3R, 4R, 5, 6R, 7, 8, West Well, and East Well). To facilitate waste placement or site construction activities, the licensee will provide timely notification to the DEQ of the intended temporary removal and/or replacement of piezometers.

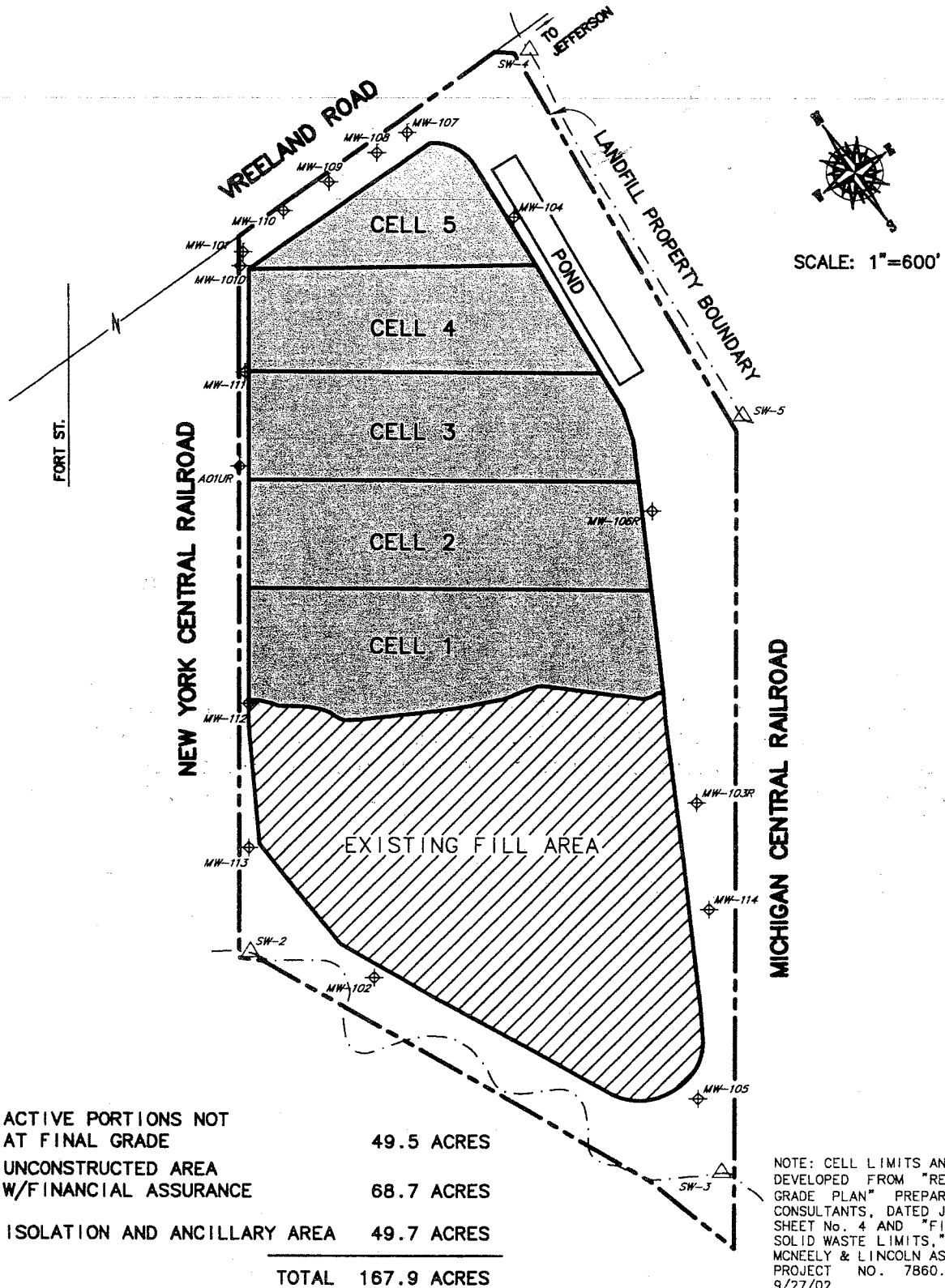
- d. In the event that the DEQ notifies the licensee that additional or relocated piezometers are required, the licensee shall install or relocate piezometers in the manner required by the DEQ within 30 days of receipt of the DEQ's request.
- e. The licensee shall flag and post the four acres of wetlands within Area 4 and maintain such flagging and posting until the wetland mitigation plan approved by the Land and Water Management Division has been implemented by the licensee. Unless authorized by modification of the Consent Judgment referenced above, only after the implementation of the approved wetland mitigation plan can the licensee then commence any landfill construction activities within the four acres that are flagged and posted.
- f. The licensee shall complete construction of the perimeter leachate collection and transmission system pursuant to the engineering plans listed in Item 9n by no later than August 31, 2006.
- g. The licensee shall place 6 inches of cover soils over the flyash waste to prevent visible emissions of the waste when the wind conditions are such that the flyash can become airborne.

21. **TERM:** This license shall remain in effect until its expiration date, unless revoked or continued in effect, as provided by, the Administrative Procedures Act, 1969 PA 306, as amended, or unless superseded by the issuance of a subsequent license.

**END OF LICENSE**



# ATTACHMENT A



## COUNTYWIDE LANDFILL GIBRALTAR LAND COMPANY

PART OF FRACTIONAL SECTION 35,  
T.4.S., R.10E., AND PART OF PRIVATE CLAIM 345,  
CITY OF GIBRALTAR, WAYNE COUNTY, MICHIGAN

NOTE: SURFACE AND GROUNDWATER MONITORING  
LOCATIONS ARE APPROXIMATE.

### LEGEND

- EXISTING GROUNDWATER MONITORING POINT
- EXISTING SURFACE WATER MONITORING POINT

PROJECT NO.: 7860.04

DRAWING NAME: 7860.04 Lic Sketch-6-2005.DWG

DATE: 06/08/05

SHEET 1 OF 1

